

1 Dean M. Harvey (SBN 250298)
2 Katherine Lubin (SBN 259826)
3 Yaman Salahi (SBN 288752)
4 Adam Gitlin (SBN 317047)
5 Jallé Dafa (SBN 290637)
6 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
7 275 Battery Street, 29th Floor
8 San Francisco, CA 94111
9 Telephone: (415) 956-1000
10 dharvey@lchb.com
11 kbenson@lchb.com
12 ysalahi@lchb.com
13 agitlin@lchb.com
14 jdafa@lchb.com

Interim Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE CALIFORNIA BAIL BOND
ANTITRUST LITIGATION**

This Document Relates To:

ALL ACTIONS

Master File No. 4:19-CV-000717-JST

CLASS ACTION

**DECLARATION OF JALLE DAFA IN
SUPPORT OF PLAINTIFFS' REQUEST
FOR JUDICIAL NOTICE IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS**

Judge: Hon. Jon S. Tigar
Hearing Date: August 26, 2020
Courtroom: 2, 4th Floor
Time: 2:00 p.m.

1 I, Jallé Dafa, declare as follows:

2 I am an associate at the law firm of Lieff Cabraser Heimann & Bernstein, LLP (“Lieff
3 Cabraser”), Interim Class Counsel in the above-titled action. I have personal knowledge of the
4 facts herein and, if called upon to testify to those facts, I could and would do so competently.

5 1. Attached hereto as **Exhibit 1** is a printout of a web page entitled “How Bail
6 Works” that contains a video entitled “Greg Padilla Bail Bonds Sacramento – FAQ.” In the
7 video, Topo Padilla states that “[t]he premium of 10% is regulated by the California Department
8 of Insurance. That rate cannot legally be discounted.” (quoting FAQ Video at 1:25, 1:49). It is
9 available online at <https://www.padillabailbonds.com/how-bail-works-faq/> (last visited July 12,
10 2020).

11 2. Attached hereto as **Exhibit 2** is a printout of an AIA web page entitled “About
12 AIA” that details the history and extent of the nationwide network of AIA bail agents. It is
13 available at: <https://www.aiasurety.com/about/> (last visited July 12, 2020).

14 3. Attached hereto as **Exhibit 3** is a Form 990 prepared in 2005 by American Bail
15 Coalition and filed with the Internal Revenue Service.

16 4. Attached hereto as **Exhibit 4** is a printout of Golden State Bail Agent’s
17 Association’s (“GSBAA”) “Resources” web page. The web page states that Topo Padilla is the
18 President of the GSBAA’s board. The GSBAA “Resources” web page is available at:
19 <https://gsbaa.org/resources/> (last visited July 12, 2020).

20 5. Attached hereto as **Exhibit 5** is an excerpt from the rate review files of the
21 California Department of Insurance with respect to a rate application filed by Defendant
22 Continental Heritage Insurance Company in 1999. It is available at
23 <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=warffRateFiling&filingNumber=99-13986> (last visited July 13, 2020).

25 6. Attached hereto as **Exhibit 6** is an excerpt from the rate review files of the
26 California Department of Insurance with respect to a rate application filed by Defendant
27 American Contractors Indemnity Company in 1999. It is available at
28 <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=warffRateFiling&filingNumber=99-13986>

[ng&filingNumber=99-4688](#) (last visited July 13, 2020).

7. Attached hereto as **Exhibit 7** is an excerpt from the rate review files of the California Department of Insurance with respect to a rate application filed by Defendant International Fidelity Insurance Company in 2017. It is available at <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=serffRateFilin>g (last visited July 13, 2020).

8. Attached hereto as **Exhibit 8** is an excerpt from Continental Heritage Insurance Company's 2014 Report entitled "Management's Discussion & Analysis of Financial Condition and Results of Operation" filed with the CDI, which was previously downloaded from the California Department of Insurance's website at
<https://interactive.web.insurance.ca.gov/companyprofile/companyprofile?event=financialStatementEvent&doFunction=annualStatementsHome>, but which is no longer available online.

9. Attached hereto as **Exhibit 9** is the Report on Examination as to the Condition of the Allegheny Casualty Company as of December 31, 2015. Robert A. Pietras, Examiner-In-Charge and Certified Financial Reviewer from the New Jersey Department of Banking and Insurance (“NJDBI”), prepared the report. It is accessible on the NJDBI’s website at http://state.nj.us/dobi/division_insurance/solvency/finexam_rpt13285allegheny2015.pdf (last visited July 12, 2020).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 13th of July, 2020, in Los Angeles, California.

/s/ Jallé Dafa
JALLÉ DAFA

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2020, I caused the foregoing to be electronically filed and served with the Clerk of the Court using the CM/ECF system to all parties of record.

/s/ Jallé Dafa
Jallé Dafa
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP